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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$17,858.00 IN
U.S. CURRENCY,

15 Defendant.

2:21-MC-00068-TLN-KJN

16

17 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Teresa
Escobar (“claimant”), appearing in *propria persona*, as follows:

19 1. On or about December 10, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately \$17,858.00
21 in U.S. Currency (hereafter “defendant currency”), which was seized on September 15, 2020.

22 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A)
23 to all known interested parties. The time has expired for any person to file a claim to the defendant currency
24 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
25 currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline is March 10, 2021.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
4 10, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be required
8 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
9 the defendant currency is subject to forfeiture shall be extended to May 10, 2021.

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11 Dated: 03/03/21

PHILLIP A. TALBERT
Acting United States Attorney

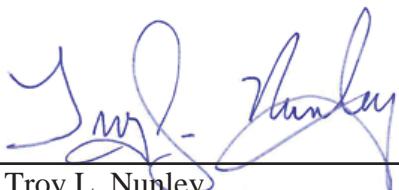
12 By: /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant United States Attorney

15
16 Dated: 03/03/21

/s/ Teresa Escobar
TERESA ESCOBAR
17 Appearin*g in Propria Persona*
18 (Signature authorized by phone)

20 **IT IS SO ORDERED.**

21 Dated: March 4, 2021



22
23 Troy L. Nunley
24 United States District Judge
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